



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NEW YORK 10007-1866

MAY 23 2013



Certified Mail

Return Receipt Required

Karie Blomquist, P.E.,
Remediation Engineer
Alliant Techsystems, Inc.
7480 Flying Cloud Drive
Minneapolis, MN 55344

RE: Administrative Order (CERCLA 02-2012-2011)
Pre-Final (95%) Remedial Design Report
Operable Unit Two
Radiation Technology, Inc. Superfund Site
Rockaway Township, New Jersey

Dear Ms. Blomquist:

The U.S. Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) have reviewed Alliant Techsystems, Inc.'s April 2013 submittal of the Pre-Final (95%) Remedial Design Report (RDR), which was required by the Administrative Order on Consent that became effective June 19, 2012. Based on its review, NJDEP has no further comments. EPA has some comments on the Sampling and Analysis Plan and the Quality Assurance Project Plan. Please address EPA's enclosed comments in a draft 100% RDR within 21 days of receipt of this letter as per the schedule found in the Remedial Design Workplan.

If you have any questions concerning the above, please contact Brian Quinn, of my staff, at 212 637-4381.

Sincerely yours,

Carole Petersen, Chief
New Jersey Remediation Branch

Enclosure

cc: Lynn Vogel, NJDEP

Review of the 95% Remedial Design Report, OU-2
Radiation Technology Inc. Superfund Site
Rockaway Township, New Jersey

SAP Addendum Comments:

1. Section 3.8 Soil Removal Verification Sampling and Section 4.0 Analytical Protocol – Since these sections are addendum to the original SAP, the section numbering does not appear to be consistent with the original SAP. Please verify and reconcile.
2. This document included Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) addenda, in which multiple references are provided, sometimes in the form of references within references. The scope of this work (soil excavation) is sufficiently different from the previous scope which mainly involved the groundwater matrix that that it would be preferable to submit a standalone document. Furthermore, if a QAPP is submitted using the UFP-QAPP guidance, it can be considered to be functionally equivalent to submitting a separate SAP and QAPP. Doing this will eliminate redundant information and minimize inconsistent information.

QAPP Addendum Comments:

1. General Comment - The use of the UFP-QAPP worksheet format is recommended to ensure all the required QAPP information is addressed. Some of the comments provided below could have been easily addressed if the consistent use of UFP-QAPP worksheet format had been adopted to prepare the QAPP.
2. Section 2.2 QAPP Identifying Information – The section referenced the original QAPP Worksheet #2 for the crosswalk. This should have been updated and resubmitted with the current QAPP.
3. Section 2.4.2 Communication Pathways – The information provided did not include drivers that would necessitate communication between responsible entities. These drivers could be modifications to the scope of work, QAPP amendments, stop work order etc. The information should include the procedures that will be used to solicit concurrences and obtain approvals to modifications and resolving problems.
4. Special Training Requirements and Certification – The information for this section was not updated. Since the work includes munitions and explosives of concern (MEC) screening, it appears that specialized training would be required to perform this type of work.

5. Project planning information such as project quality objectives, project specific measurement criteria, ARARs or action limits, project scheduling and secondary data evaluation/usage should be included. Information related to the MEC screening should also be included. Please refer to UFP-QAPP Manual Sections 2.6 to 2.8 for additional information. UFP-QAPP Worksheets #10 to #16 should be used to document this information.
6. The information related to the sampling tasks was not included with the addendum. They include the sampling design, sampling procedures, container requirements, required field equipment, field documentation procedures among others. Please see UFP-QAPP Manual Section 3.1. These should be documented using UFP-QAPP Worksheets #17 to #22.

Section 3.3 Sampling Handling and Tracking System and Section 3.4 Sampling Handling – It is not clear if these two sections are replacing similarly numbered sections in the original QAPP. If they are, the information is not complete. There is no information on sample collection documentation, chain of custody requirements and the quality control sample requirements. Please verify and provide some clarifications.